

Phew, my Sanitary Survey is over – or is it?

You just marked “Complete Sanitary Survey” off of your list of things to do this year and you figure you have another three years (actually about 2 ½ years) to sit back and relax, right? Well, that is almost right. We all know you put in a significant amount of time just keeping things running as smoothly as you do, but there is something else you can do that will greatly reduce your potential for headaches down the road; that being a simple reply to your sanitary survey letter.

If you read closely, you will note the following words in the second to last paragraph of your sanitary survey findings letter: *“In accordance with the Federal Groundwater Rule, the Water System is to provide a written response to the items listed above in no less than 30 days, or by date, 2011. The written response is to indicate that the compliance dates above are acceptable or provide a detailed alternative schedule for review and approval. All identified system deficiencies shall be corrected within 120 days of the date of this notification letter or in accordance with an alternate schedule that has been approved by the Division.”* “Whoa, am I in trouble?”, “What is this 120 days thing?”, “I’ll just skip it- they’ll call me if something is wrong...” Sound familiar? Well, as much as that seems like just more language to confuse the masses, it is an important instruction for all water systems. The Water Supply Division (WSD) wants to help you, the water system, stay in compliance with the Federal Groundwater Rule (and the Surface Water Treatment Rule, and the Total Coliform Rule, and the... but I digress); but we need your help!

We all know how difficult it is to be assigned a compliance schedule; after all, how can we, the WSD, fully understand all the intricacies of your water system, especially the budgeting and planning sides of operating something we see once every three or so years? While we do our best to get a complete picture during our inspection, we still need you to help us further understand the limiting factors in bringing your system into full compliance with the WSR and this is your chance!

Open a written dialogue with us, either via hard-copy correspondence or email (the surveyor who conducted your sanitary survey has included his or her email address in the sanitary survey letter) and tell us exactly what you believe to be a reasonable compliance schedule for your particular water system to adequately address the deficiencies identified during your sanitary survey. If we agree with your proposed schedule (and we are usually quite agreeable) then you have just set up your own ‘alternate schedule’ identified up there in paragraph 2 and gotten rid of the 120 days requirement! Remember though, according to the Federal GWR, no schedule can extend beyond three (3) years from the date the deficiency was identified (and many of the “fixes” required can be done in an afternoon).

You are almost done –***when you actually complete the work that you promised us you would do, tell us!!*** Be proud of all that time and effort you put into building a stellar water system that you are proud to call your own. The same correspondence you began within 30 days of your original survey now needs to be re-opened with “Dear Water Supply Division, I/we have corrected the following deficiencies.” It is usually helpful if you can address each deficiency in the order that they were identified in the sanitary survey findings letter, but not imperative. If you originally replied by email, you can simply reply via the email chain you previously created and have a handy record of all correspondence that occurred relative to this specific aspect of your water system.

So what does this do for you? Remember a couple months ago when many of you received your Consumer Confidence Report template in the mail? Many of you also probably spent countless hours on the telephone with various WSD personnel attempting to correct incorrect information relative to the outstanding deficiencies for your water system. Simply letting us know that corrected deficiencies via email or snail mail will hopefully stop that from occurring. Keeping the WSD apprised of your activities relative to your water system in writing (via the most recent sanitary surveyor), reduce the odds of receiving an incorrect CCR template or Operating Permit.

Again, the WSD is here to provide you assistance in whatever ways we can, we truly do want to help, but sometimes we need your help back. If we keep in mind that this is a collaborative effort, everyone's headaches can be reduced and water systems can run that much more smoothly. Our goal is the same as yours: provide an adequate supply of safe, clean drinking water from the source to the tap of every user on your system.